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8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE EASTERN DISTRICT OF CALIFORNIA
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 RYAN WILSON,

15 Defendant.
16

Case No. 1:21-cr-00315-DAD-BAM

**STIPULATION TO CONTINUE STATUS
CONFERENCE; ORDER**

Date: February 22, 2023

Time: 1:00 p.m.

Judge: Hon. Barbara A. McAuliffe

17 IT IS HEREBY STIPULATED by and between the parties through their respective
18 counsel, Assistant United States Attorney Kimberly Sanchez, counsel for plaintiff, and Assistant
19 Federal Defender Reed Grantham, counsel for Ryan Wilson, that the status conference currently
20 scheduled for December 14, 2022, at 1:00 p.m. may be continued to February 22, 2023, at 1:00
21 p.m.

22 The parties agree and stipulate, and request that the Court find the following. The
23 government has provided discovery in this matter. The defense remains in the process of
24 reviewing the discovery, conducting further investigation, and discussing the matter with his
25 client. Specifically, the defense has made the government aware of the pending investigative
26 efforts of the defense. Accordingly, the parties request that the status conference in this matter be
27 continued to permit continued defense investigation.

28 The requested continuance will conserve time and resources for the parties and the Court.

1 Counsel for defendant believes that failure to grant the above-requested continuance would deny
2 him the reasonable time necessary for effective preparation, taking into account the exercise of
3 due diligence. The government does not object to the continuance.

4 Based on the above-stated findings, the ends of justice served by continuing the case as
5 requested outweigh the interest of the public and the defendant in a trial within the original date
6 prescribed by the Speedy Trial Act. For the purpose of computing time under the Speedy Trial
7 Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of December
8 14, 2022, to February 22, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §§
9 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by
10 the Court at defendant's request on the basis of the Court's finding that the ends of justice served
11 by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

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13 Respectfully submitted,

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15 PHILLIP A. TALBERT
United States Attorney

16 Date: December 7, 2022

/s/ Kimberly Sanchez
KIMBERLY SANCHEZ
Assistant United States Attorney
Attorney for Plaintiff

18
19 HEATHER E. WILLIAMS
Federal Defender

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21 Date: December 7, 2022

/s/ Reed Grantham
REED GRANTHAM
Assistant Federal Defender
Attorney for Defendant
RYAN WILSON

ORDER

IT IS SO ORDERED. The status conference currently scheduled for December 14, 2022, at 1:00 p.m. is hereby continued to **February 22, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. The time period to February 22, 2023, inclusive, is deemed excludable pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and 3161(h)(7)(B)(i), (ii) and (iv) because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

IT IS SO ORDERED.

Dated: **December 7, 2022**

/s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE